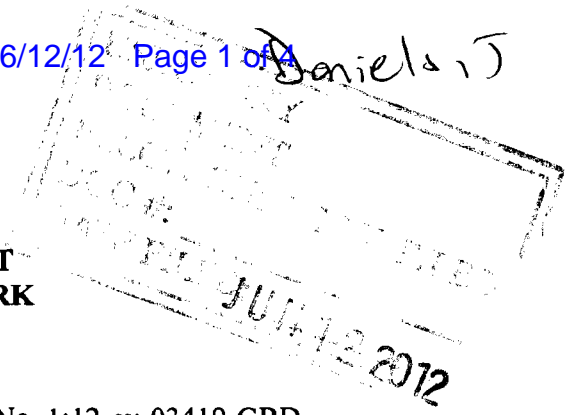


Daniels, J



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JEFFREY LAYDON, on behalf of himself and all
others similarly situated,

Plaintiff,

- against -

MIZUHO BANK, LTD., THE BANK OF TOKYO-
MITSUBISHI UFJ, LTD., SUMITOMO MITSUI
BANKING CORPORATION, RESONA BANK, LTD.,
MIZUHO CORPORATE BANK, LTD., THE BANK
OF YOKOHAMA, LTD., MITSUBISHI UFJ TRUST
AND BANKING CORPORATION, MIZUHO TRUST
AND BANKING CO., LTD., THE SUMITOMO
TRUST AND BANKING CO., LTD., CITIBANK,
JAPAN LTD., JPMORGAN CHASE BANK, NA, THE
ROYAL BANK OF SCOTLAND GROUP PLC,
DEUTSCHE BANK AG., UBS AG, BNP PARIBAS
S.A., SHINKIN CENTRAL BANK, THE SHOKO
CHUKIN BANK, THE NORINCHUKIN BANK,
BARCLAYS BANK PLC, HSBC HOLDINGS PLC,
CITIBANK NA, CRÉDIT AGRICOLE CIB, LLOYDS
BANKING GROUP PLC, SOCIÉTÉ GÉNÉRALE,
AND RABOBANK GROUP,

Defendants.

Docket No. 1:12-cv-03419-GBD

**STIPULATION AND [PROPOSED] ORDER ADJOURNING DEFENDANT MIZUHO
CORPORATE BANK, LTD.'s TIME TO ANSWER, MOVE TO DISMISS, OR
OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Plaintiff Jeffrey Laydon ("Plaintiff") and defendant Mizuho Corporate Bank, Ltd.
("MHCB"), by and through their respective undersigned counsel, subject to this Court's
approval, and to the reservation of rights contained in paragraph 3 below, agree and stipulate as
follows:

RECITALS

WHEREAS, on April 30, 2012, Plaintiff commenced this action in this District by the filing of a summons and complaint (the "Complaint") against the defendants;

WHEREAS Plaintiff has commenced service of the Complaint upon the defendants;

WHEREAS MHCB has agreed to waive service of the Complaint pursuant to Rule 4(d) of the Federal Rules of Civil Procedure, and Plaintiff continues to attempt to serve the other defendants with the Complaint; and

WHEREAS each defendant's response to the Complaint would be due on different dates depending upon the date of service.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED as follows:

1. MHCB agrees to waive service of the Complaint pursuant to Rule 4(d) of the Federal Rules of Civil Procedure.

2. MHCB's time to answer, move to dismiss or otherwise respond to the Complaint is hereby adjourned *sine die* and shall be determined by a later stipulation between the parties or order of the Court.

3. Except as to the defense of insufficiency of service of process of the Complaint, none of MHCB's defenses, including without limitation a defense based upon lack of personal jurisdiction, is prejudiced or waived by MHCB's executing, agreeing to, or filing this Stipulation.

4. This Stipulation may be executed in separate counterparts, and counterparts may be executed in facsimile form, each of which shall be an original.

Dated: June 6, 2012

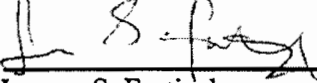
**LOWEY DANNENBERG COHEN
& HART, P.C.**

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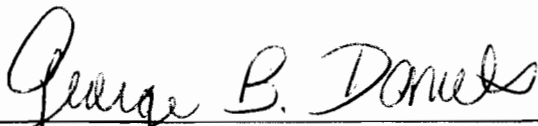
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*Attorneys for Defendant Mizuho Corporate
Bank, Ltd.*

SO ORDERED.

DATED: 

New York, New York



HON. GEORGE B. DANIELS
United States District Judge

Dated: June 6, 2012

**LOWEY DANNENBERG COHEN
& HART, P.C.**

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*Attorneys for Defendant Mizuho Corporate
Bank, Ltd.*

SO ORDERED.

DATED:

New York, New York

HON. GEORGE B. DANIELS
United States District Judge